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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAYCOB TYLER KUTZERA,

Defendant.

**Case No. CR-17-48-GF-BMM**

**DEFENDANT'S  
MOTION FOR EXTENSION OF  
TIME TO FILE PRETRIAL  
MOTIONS**

COMES NOW the Defendant, Jaycob Tyler Kutzera, by and through his Counsel, Evangelo Arvanetes, Assistant Federal Defender and the Federal Defenders of Montana, and respectfully requests this Court for an extension of time in which to file the pretrial motions in this matter. The pretrial motions deadline is presently set for Monday, February 5, 2018, and the undersigned requests an extension until Thursday, February 8, 2018.

The undersigned also requests an equal amount of time to extend the Government's deadline as well.

Currently, jury trial is set for March 6, 2018.

This extension is to prepare motions in the present case.

1. The charges against Mr. Kutzera are serious.
2. Based upon the research of the case, the additional time period will be needed to conduct legal research for the motion(s) and review the expert's report and prepare the expert notice.
3. The undersigned has reached out to Assistant United States Attorney, Cyndee Peterson, but has not yet heard back concerning the Government's position to this extension. Nevertheless, to ensure that the Government is placed in an equal position as the defense, the undersigned also requests that their response deadline is extended for the same period of time.

WHEREFORE, the undersigned requests an extension of time to file pretrial motions in this matter currently due on Monday, February 5, 2018, until Thursday, February 8, 2018.

RESPECTFULLY SUBMITTED this 5<sup>th</sup> day of February, 2018.

/s/ Evangelo Arvanetes

**CERTIFICATE OF SERVICE**  
**L.R. 5.2(b)**

I hereby certify that on February 5, 2018, a copy of the foregoing document was served on the following persons by the following means:

1, 2 CM-ECF  
       Hand Delivery  
  3   Mail  
       Overnight Delivery Service  
       Fax  
       E-Mail

1. CLERK, UNITED STATES DISTRICT COURT
2. CYNDEE L. PETERSON  
Assistant United States Attorney  
United States Attorney's Office  
Counsel for the United States of America
3. JAYCOB TYLER KUTZERA  
Defendant

/s/ Evangelo Arvanetes